

Exhibit 6

BESTREICH REALTY GROUP, LLC

POLICY MANUAL: EMPLOYEES

This Manual is provided as an informational guide only. THE MANUAL IS NOT TO BE CONSIDERED A CONTRACT. ALL EMPLOYEES ARE AT-WILL AND THEIR EMPLOYMENT MAY BE TERMINATED AT ANY TIME, FOR ANY OR NO REASON, WITH OR WITHOUT NOTICE. BESTREICH REALTY GROUP, LLC (the "Firm") reserves the right in its sole discretion, with or without notice, cause or consideration, to modify this manual, or modify or terminate any of the Firm's policies (other than the at-will policy), procedures, or employee benefit programs, whether or not described in this Manual.

This manual is the property of the Firm. It is to be used exclusively by employees of the Firm.

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Acknowledgement of Receipt

This will acknowledge that I have received my copy of the Bestreich Realty Group, LLC Policy Manual: Employees, and that I will familiarize myself with its contents.

My signature below further affirms that I have received, reviewed and agree to comply with the Firm's policies in general and, specifically, the Drug Free Workplace, E-mail, the Internet and other Electronic and Telephonic Communications, Intellectual Property, and Confidentiality policies.

My signature below affirms that I will conduct myself when carrying out my duties for the Firm in a manner that in no way results in a conflict of interest between the Firm and another entity and in manner that is not in violation of any legal or contractual obligations I may have.

Additionally, my signature below affirms that I consent to the Firm recording any and all conversations on its telephone and other electronic systems.

I understand that the Policy Manual: Employees represents only current policies, regulations, and benefits, and that it does not create a contract of employment. The Firm retains the right to change these policies and benefits as it deems advisable, at any time, with or without notice.

I understand that I have the right to terminate my employment at any time, with or without cause, and that the Firm has the same right. I further understand that my status as an at-will employee may not be changed except in writing signed by the President of the Firm.

Serge Sarkisian
Printed Full Name of Employee

[Signature]
Signature of Employee

6/24/2016
Date

Introduction to Human Resource Policies

As you read this manual, you will see the term "the Firm." The Firm means Bestreich Realty Group, LLC. As an employee of the Firm, you will want to know what you can expect from us and what we expect from you. This Manual will give you that information by outlining our Firm's current benefits, practices and policies.

This Manual has been written to serve as a guide for the Employer/Employee relationship. The contents of this Manual constitute only a summary of the human resources policies, employee benefits, and employment regulations in effect at the time of publication. This Manual supersedes all previous manuals and policies which are in any way inconsistent with the contents of this Manual. The most updated and current version of this Manual will be maintained on the Firm shared drive or by the Director of Operations.

Senior Management is responsible for interpreting and implementing the Firm's policies on a daily basis. Senior Management includes Derek Bestreich, President; Luke Sproviero, VP of Sales; Erik Rodriguez, VP of Sales; Steve Reynolds, VP of Sales; and Adam Lobel, VP of Sales. You should speak first with Director of Operations whenever you have a question or suggestion about how the Firm operates.

Please understand that this Manual is in no way meant to be comprehensive or meant to address all possible applications or exceptions to the policies and benefits summarized. For this reason, if you have any questions concerning the applicability of a policy or eligibility for a benefit please see the Director of Operations.

This Manual or other policies distributed by the Firm should not be construed as creating any kind of "employment contract," since the Firm reserves the right to add, change, or delete policies and benefits as it deems appropriate, at any time, with or without notice.

THIS MANUAL DOES NOT ALTER THE "AT-WILL" NATURE OF YOUR EMPLOYMENT. YOU HAVE THE RIGHT TO TERMINATE YOUR EMPLOYMENT AT ANY TIME, WITH OR WITHOUT CAUSE OR NOTICE, AND THE FIRM HAS THE SAME RIGHT. YOUR STATUS AS AN "AT-WILL" EMPLOYEE MAY NOT BE CHANGED, EXCEPT IN WRITING, SIGNED BY THE PRESIDENT OF THE FIRM.

This manual and the information contained herein are to be treated as confidential. No portion of this manual is to be disclosed to others, except to employees of the Firm, and others affiliated with the Firm, whose knowledge of the information is required in the normal course of business.

You should keep this Manual accessible as a guide and ready reference throughout your employment with the Firm. If you have any questions as you read through the Manual, please do not hesitate to discuss them with the Director of Operations.

The policies set forth in these materials apply to all employees of the Firm and do not apply to temporary workers not employed by the Firm or independent contractors, except where otherwise indicated.

Guiding Policies

Employment at Will

The employment relationship is "at will" and either you or the Firm may terminate the employment relationship at any time, with or without cause. In addition, the Firm may change your compensation (including any bonus plans), duties, assignments, responsibilities, location of your position, or other terms and conditions of your employment at any time at its sole discretion.

Equal Employment Opportunity

The Firm is an equal opportunity employer. It is the Firm's policy to take affirmative steps to ensure that all employment decisions are based on legitimate business considerations, and that all employees and job applicants are treated without regard to age, color, creed, disability, marital status, military status, national origin (including ancestry), predisposing genetic characteristics, race, sex, sexual orientation (including actual or perceived heterosexuality, homosexuality, bisexuality and asexuality), and any other characteristics protected by applicable federal, state or local laws. This policy applies to the entire employment process, including advertising, recruiting, hiring, placement, promotion, transfer, compensation, training and termination. The Firm also provides reasonable accommodation for qualified individuals with disabilities in accordance with the Americans with Disabilities Act (ADA) or similar state or local law.

Each and every employee of the Firm is responsible for carrying out the Firm's Equal Employment Opportunity policy. Violation of this policy is strictly prohibited. Any questions you have regarding this policy should be directed to the Director of Operations.

Additional information regarding the Firm's equal opportunity policies and guidelines as well as other employment rights may be found on the Firm's intranet.

Discrimination & Harassment

The Firm does not and will not tolerate discrimination against and harassment of our employees, applicants, or clients. The term "harassment" includes, but is not limited to, slurs, jokes, and other verbal, graphic or physical conduct relating to an individual's age, color, creed, disability, marital status, military status, national origin (including ancestry), predisposing genetic characteristics, race, sex, sexual orientation (including actual or perceived heterosexuality, homosexuality, bisexuality and asexuality), and any other characteristics protected by applicable federal, state or local laws.

Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, or engaging in other verbal, physical, or visual conduct of a sexual nature where either:

- Submission to such conduct is made an explicit or implicit term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for employment decisions;
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work; or
- Such conduct is creating an intimidating, hostile, or offensive working environment.

VIOLATION OF THIS POLICY WILL SUBJECT AN EMPLOYEE TO DISCIPLINARY ACTION, UP TO AND INCLUDING IMMEDIATE DISCHARGE.

In the event that you have a complaint concerning harassment, wish to report an incident, or learn that conduct of the nature prohibited by the Firm's discrimination and harassment policies may be occurring, you should immediately report the matter to the **Director of Operations**. The matter will be thoroughly investigated and, where appropriate, disciplinary action will be taken.

Our supervisors and managers are also covered by this policy and are prohibited from engaging in any form of discriminating or harassing conduct. Further, no supervisor or other member of management has the authority to suggest to any employee or applicant that the individual's employment, continued employment, or future advancement will be affected in any way by the individual's entering into (or refusing to enter into) any form of personal relationship with the supervisor or member of management. Such conduct is a direct violation of this policy.

Any Firm supervisor who receives a report or complaint of discrimination or harassment, or who learns that conduct of the nature prohibited by the Firm's discrimination and harassment policies may be occurring must report that offense immediately to the Director of Operations, the person specifically designated by Senior Management for such purposes. Any supervisor not complying with this policy will be subject to disciplinary action up to and including termination of employment. If you believe that a supervisor or member of management has acted inconsistently with this policy, if you are not comfortable bringing a complaint regarding harassment to your immediate supervisor or if you believe that your complaint concerning a coworker, a client, or vendor has not been handled to your satisfaction, please immediately contact either the Director of Operations or the President.

YOU WILL NOT BE PENALIZED IN ANY WAY FOR REPORTING SUCH IMPROPER CONDUCT.

The Firm prohibits any form of retaliation against any employee for filing a good faith complaint under this policy or for assisting in a complaint investigation. If it is determined that a Firm employee has committed harassment or other discrimination in violation of our policies, corrective action will be taken, ranging from verbal or written warnings up to and including termination of employment. In situations where the facts may be unclear or the degree of culpability does not require disciplinary measures, appropriate action may nonetheless be taken to ensure that the Firm's policies in this regard are followed. In the case of harassment of or by a client, consultant, temporary employee, or vendor, appropriate corrective action will be undertaken. **Please do not assume that the Firm is aware of your problem. Bring your complaints and concerns to our attention so that we can resolve them.**

Drug Free Workplace

The Firm is committed to providing a productive and safe working environment for all of its employees, and to establishing policies and programs that promote high ethical standards, quality, and employee health. A workplace free of substance abuse is vital to our business, the health and productivity of our employees, and to the quality of our products and services. The purpose of this policy is to provide guidelines regarding the handling of substance abuse, which includes the abuse of alcohol and controlled substances, and to provide supervisors with practical procedures for ensuring a workplace free of substance abuse.

- The consumption, possession, sale, purchase, or distribution of alcohol is prohibited while on the job or on the Firm premises, except when approved by the Senior Management.
- The possession, use, sale, purchase, dispensation or distribution of illegal substances, or the use of prescription drugs when not prescribed by one's own physician, is not permitted while on the job or on the Firm premises for any reason.

"On the job" is defined broadly and includes all Firm premises, including parking lots and recreational areas of any Firm facility, or other locations where you are conducting the Firm's business. If you are found to be in violation of this policy, you will be subject to disciplinary action, up to and including immediate termination of employment.

Job performance affected by substance abuse will be treated in the same manner as any other work performance problem. Deteriorating performance or inappropriate behavior or incidents should be documented and disciplinary procedures followed, as appropriate. Supervisors are strongly encouraged to consult Senior Management for advice in dealing with such situations.

Employees who have a substance abuse problem are encouraged to seek outside assistance. Please note that in the event that you seek out such assistance, you are still expected to maintain satisfactory job performance and attendance at all times.

Privacy in the Workplace

While the Firm recognizes that at times employees conduct some personal business during the workday, situations may arise in which employee activities are monitored, as noted in the Firm's policy entitled "E-Mail, the Internet, and other Electronic and Telephonic Communications." Additionally, all materials located on the Firm premises, such as information maintained electronically, on paper, or in any other hard-copy form, in any area within the Firm's premises, including all offices, workspaces, drawers and lockers, are regarded as property of the Firm and may be accessed or reviewed by Firm representatives with or without prior notification or consent of the employee. This includes files that are marked "personal" or "private."

To the extent you are conducting personal business on the Firm's premises or during the workday, you should bear these considerations in mind.

Workplace Searches

In order to protect the safety and property of all employees, the Firm reserves the right to inspect employees' desks, cabinets, work areas, purses, and briefcases, as well as motor vehicles and any other personal belongings brought onto or being brought out of Firm property.

Failure to cooperate with such inspections is a violation of this policy and may result in disciplinary action up to and including termination.

Hours of Work

Employee Status

Full-time employees are active employees who are normally scheduled to work 40 hours a week. Full-time employees are eligible for all of the benefits set forth in this Manual.

Part-time employees are active employees who are normally scheduled to work fewer than 40 hours a week. Part-time employees, regardless of how many hours they work per week, are not eligible for benefits unless otherwise stated.

Temporary or contract workers, regardless of how many hours they work per week, are not eligible for benefits unless otherwise stated.

If you have any questions concerning your status or the benefits for which you qualify, please contact the Director of Operations.

Business Hours

Business hours are from 9 am to 5 pm, Monday through Friday. Your hours of work may vary depending on your duties and responsibilities.

Attendance and Punctuality

You are required to maintain regular and punctual attendance at work. You are expected to begin work at your designated starting time. If you anticipate a delay, you are responsible for calling your supervisor directly well in advance of your scheduled arrival time. Unexcused or unexplained absence may lead to disciplinary action, up to and including termination of employment.

The Firm and your co-workers count on your being at work on a regular basis to carry out the responsibilities of your job. Excessive absences or tardiness subtract from your overall job performance and usually add to the workload of other employees. Therefore, if your absence or tardiness record becomes habitual or excessive, the Firm will evaluate your situation to determine the appropriate course of corrective action. In these instances, you may be subject to disciplinary action up to and including termination of employment, unless your absence is related to an approved state or federal mandated leave.

Work Schedules

Your work schedule is determined by your supervisor. The regular hours of work may vary by location and employee based on the nature of your work, the hours and other factors such as workload. Daily and/or weekly schedules may be changed at any time at the discretion of the Firm to meet business needs.

Overtime Pay

As a condition of employment, you may be required to work overtime.

Non-Exempt Employees (Full-Time and Part-Time)

Hours worked in excess of 40 in any work week are classified as overtime. All overtime work must be approved in advance by your supervisor. If you are a non-exempt employee and have worked more than 40 hours in a work week, exclusive of meal periods, you are paid overtime at the rate of time-and-one-half pay for each hour worked over 40.

- If you are paid for a holiday, Paid Time Off, etc., during the work week, the day is not counted toward the 40 hour total.
- Lunch breaks are not counted as "time worked", unless you actually work during the lunch period.

Non-exempt employees are required by federal and state law and by this Firm to keep an accurate record of their hours worked each day and each week. The Director of Operations will advise you how you are to record your time. We expect you to record on your time record any and all time that you work for the Firm. All overtime work must be pre-approved by your supervisor. Failure to receive authorization to work overtime hours may result in discipline up to and including termination.

Any changes or corrections to your time record must be initialed by you and your supervisor or the Director of Operations.

Exempt Employees

If you are an exempt employee, you are not paid overtime for hours worked in excess of 40 in any work week. Your job duties, however, may require that you work additional hours as necessary.

NOTE: The terms "exempt" and "non-exempt" apply to the federal Fair Labor Standards Act and relevant state laws, which describe whether or not an employee is eligible for overtime pay. Exempt employees are not entitled to overtime pay, and are paid on a salary basis. Only the Director of Operations or the President has the authority to define jobs as non-exempt or exempt. All questions should be referred to the Director of Operations.

Lunch & Break Periods

The Firm provides all non-exempt employees a paid 30-minute lunch break and two paid breaks each day (15 minutes in the a.m. and 15 minutes in the p.m.). Lunch and break times are set for each department and may be varied to meet business needs. Supervisors are responsible for setting lunch schedules. You are not expected to work through lunch periods unless required specifically by Senior Management.

Exempt employees are to use their reasonable and professional judgment for lunch and other breaks.

Time Off

Introduction to Time Off

The Firm recognizes the importance of balancing your personal life with your professional life and offers its employees paid and unpaid time off.

For example, we understand there may be times when you need to be away from work to take care of pressing personal or family problems or to meet other obligations. We recognize, too, that off-time is important for your health and well-being, and that taking significant time away from the office makes you more effective and productive when you return.

Holidays

If you are a full-time employee, you are granted paid holidays, provided the holiday falls on a regularly scheduled workday. If a holiday falls on a Saturday, the holiday will be celebrated the Friday before. If a holiday falls on a Sunday, the holiday will be celebrated on the Monday after. If you are an employee engaged in shift operations, you will receive the paid holidays that fall within your scheduled shifts. Temporary, part-time, and contract employees are not eligible for holiday pay. The Firm currently celebrates the following federally recognized holidays:

New Year's Day
Martin Luther King, Jr. Day
George Washington's Birthday
Memorial Day
Independence Day
Labor Day
Columbus Day
Veterans Day
Thanksgiving Day
Christmas Day

If you are absent on a working day preceding or following a holiday, or on the holiday itself if scheduled to work, you will not be paid for that day or for the holiday unless the absence is approved by your supervisor, and/or as applicable, you provide a physician's note indicating that you were ill on the working day(s).

Vacation

To thank employees for their time and commitment, the Firm encourages employees to take time off each year. Vacation may be taken as full days or half-days only, not in individual hours or increments of less than ½ day (4 hours).

Employees will be credited with their earned vacation leave on the last day of each full calendar month of service, up to their maximum vacation accrual cap.

Employees who are on unpaid leave for more than five (5) days during a calendar month shall not receive credit for that month for the purposes of vacation accrual.

Rates are expressed based on full time employment of 40 hours per week and eight hours each day. Therefore, full time employees accrue 6.667 hours per month and the equivalent of 10 days (80 hours) per calendar year. Employees may not accrue vacation in excess of their annual accumulation (the maximum vacation accrual cap). Vacation accrued but not used in any calendar year will be forfeited. Therefore, the Firm does not permit carry over of vacation time from year to year. With written authorization of the President part-time employees may accrue vacation on the ratio that such part-time service bears to full-time service.

Vacation time should be arranged in advance and with at least thirty (30) days' notice if possible. In all cases, whether the need to take vacation is foreseeable or not, the employee, where practicable, must make a reasonable effort to schedule his/her vacation time off so as not to interfere with the efficient functioning of his or her department.

Employees whose employment ends will be paid for their accrued vacation balance up to the date of termination.

Sick Leave

Employees are eligible to for paid sick leave in accordance with this policy. From the commencement of employment, each employee accrues one (1) hour of sick leave for every 30 hours worked for up to a maximum 40 hours in any calendar year. A calendar year is defined as the 12-month period between January 1 and December 31. You may take sick leave in 4-hour increments but if your health needs require different increments, you are advised to contact the Director of Operations, so that we can attempt to reasonably meet your needs in accordance with New York City law.

Employees may use sick leave for the following purposes: (1) need for preventive medical care; (2) mental or physical illness, injury, or health condition; and (3) need for medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition for yourself or for a family member.

Where possible, employees must provide at least seven (7) days written notice of the need to take sick leave. Where notice is unforeseeable, employees are asked to provide notice as soon as practicable.

Employees must complete a verification form by a licensed health care provider when you use more than three (3) consecutive workdays as sick leave within seven days of returning to work. This documentation must explain the need for the amount of sick leave taken and indicate that the leave was for an authorized purpose. Employees may obtain verification forms from the Director of Operations.

Accrued and unused sick leave from one year may be carried over to the next year but at no time will employees accrue more than 40 hours of sick leave in any calendar year.

Accrued and unused sick leave will not be paid out upon termination of employment. The Firm prohibits retaliation against employees who exercise their rights under this policy.

To the extent that any of this policy conflicts with current law, the Firm will apply current law.

Failure to comply with any portion of this may result in discipline up to and including termination.

Bereavement Leave

Employees are eligible to receive up to 3 days of paid and 2 days of unpaid bereavement leave in the event they miss regularly scheduled work days due to the death or funeral of a member of the employee's immediate family. Your immediate family includes your spouse, children, stepchildren, parents, grandparents, grandchildren, brother or sister, your spouse's parents, and any other relative residing in the same household as the employee.

When an employee is notified of a death in his or her immediate family while at work, bereavement leave will commence when the employee leaves work after being notified. All time off in connection with the death of one of the above-listed individuals should be scheduled with your supervisor.

Job Abandonment

Employees who fail to report to work for three consecutive business days without notifying their supervisor will be deemed to have abandoned their job. The Firm will treat such employees as having voluntarily resigned without notice effective as of the third day.

Jury Duty

Employees called to jury service will be paid according to applicable laws. Employees are expected to cooperate with the Firm in rescheduling jury service to minimize interference with

Firm responsibilities. Employees also are expected to report to work when it does not conflict with their court obligations, including for partial work days.

Voting Time

All employees should be able to vote either before or after regularly assigned work hours. However, when this is not possible due to work schedules, employees will receive up to two hours during the work day to vote. Time off for voting should be reported and coded appropriately on timekeeping records.

Military Duty

The Firm provides unpaid leaves of absence to all full-time and part-time employees for military or reserve duty in accordance with applicable state and federal laws. A request for military leave should be submitted promptly and accompanied by a copy of the orders indicating the beginning and ending dates of the duty period. Eligibility for reinstatement after the military duty is completed will be determined in accordance with applicable federal and state laws.

If you have questions about any of these leaves of absence, you should contact your supervisor.

Compensation

Payment Period

Depending on your position, you may be paid on a bi-weekly basis. Your supervisor will inform you when you will be paid.

Health, 401(k) or Other Benefit Plans

At this time, the Firm does not offer health care or insurance for employees.

Deductions

The statement attached to your paycheck shows the amount you earned for that pay period. It also itemizes your deductions and taxes and shows the amount of your take-home pay.

As required by law, the following taxes will be deducted from your pay:

- Federal withholding tax (income tax);
- State and local taxes where applicable;
- FICA (Federal Insurance Contribution Act).

Deductions for local amenities may also be arranged.

Direct Deposit

For your convenience, the Firm offers the benefit of directly depositing your pay into your bank account. An employee that wishes to take advantage of this benefit should inform their supervisor. Employees are encouraged to use the direct deposit method of receipt of their pay.

Employee Performance & Business Conduct

Professional Conduct

As a representative of the Firm, your conduct reflects not only on you personally, but also on the Firm and our business reputation.

We rely on your sense of responsibility and judgment to conduct yourself in a professional manner. Any on- or off-premise behavior that negatively impacts the work environment or tarnishes the reputation or professional standing of the Firm will not be tolerated. Such inappropriate behavior would include, but not be limited to, indecent, lewd, or illegal acts, violence or threats of violence or other behavior inconsistent with the professional or ethical standards of the Firm. Violations of this policy will result in disciplinary action up to and including termination of employment.

Outside Employment

With advance authorization, you are permitted to engage in outside employment or business activity, provided it does not interfere nor conflict with the interests of the Firm, and does not create the appearance of a conflict of interest. Such authorization must be in writing and signed by the President.

Permission will be granted for employment with a non-competitor organization, provided that, in the sole discretion of the Firm,

- (a) it does not jeopardize the Firm's integrity or reputation;
- (b) it does not interfere with your ability to effectively perform in your position with the Firm;
- (c) it is not competitive with the Firm's activities; and
- (d) it does not and cannot reasonably be expected to subject the Firm or the employee to regulatory oversight, potential liability, or conflicts of interest.

If any of these conditions exist or develop, you will be required to discontinue the outside employment. Under no circumstances should you represent another organization in its dealings with the Firm, or vice versa. Employment with a competitor company is strictly prohibited, as is the use of any of the Firm's technology, equipment, or proprietary information for other than the Firm's business purposes.

If you are involved in any endeavor which interferes or conflicts with the interests of the Firm, you will be required to discontinue such participation in order to retain your position with the Firm. The determination of whether or not outside employment is permitted is entirely in the Firm's sole and absolute discretion.

Conflicts of Interest

In addition to provisions set forth elsewhere in this Policy Manual, the purpose of this policy is to advise employees what may constitute a conflict of interest. Violation of this policy will result in disciplinary action, up to and including termination.

Financial Interest in Other Business

It is our policy to forbid employees to deal in any other businesses which compete with our Firm in any way.

Acceptance of Gifts

Employees may not request or accept any gift or gratuity of any kind from a customer or supplier of a value greater than \$100.00, without the express written authorization of President.

If you think that there is a possibility that you may have a conflict of interest, it is your responsibility to notify the President.

Confidentiality

All employees of the Firm are obligated to maintain strict confidentiality with respect to the Firm's clients and Firm matters. As such, as a condition of employment, every employee is required to sign a confidentiality and restrictive covenant agreement. This is a legally binding document and should, therefore, be read in detail before signing. Failure to execute or abide by this agreement will result in termination. Compliance with the terms of the agreement is extremely important and legally required. This obligation remains even after an employee's employment relationship with the Firm ends.

Intellectual Property

All material, files or documents, inventions, models, concepts, tools, formulae or similar creations you prepare or conceive during the term of your employment with the Firm that relates to the Firm's business and that can be protected by copyright, patent, trade or service marks, or that constitutes confidential information belongs to the Firm irrespective of whether or not you prepare such material during or after work and whether you use Firm resources or not. Such material or documents are herein referred to as "Works."

By acknowledging receipt of this Manual, you (a) assign any and all Works to the Firm and waive any and all claims, including but not limited to claims of ownership and royalty, with respect to the Works; (b) agree to assist the Firm in obtaining or maintaining for itself, at its own expense, patents, copyrights, trademarks, service marks or other protection of the Works in such jurisdictions as the Firm, in its sole discretion, may request, and to execute any and all documents, instruments or certificates, and do any and all other things, necessary to more fully vest ownership in the Works with the Firm; and (c) acknowledge that all Works shall be deemed "works made for hire" under the United States Copyright Act of 1976, as amended 17 U.S.C. Sect. 101.

Firm Property

Employees may be given the use of Firm-owned laptops, phones, tools, projectors or other office equipment that may be transported, taken home, used offsite, or are otherwise under the employee's control. Employees who use Firm property of any kind are required to document what Firm assets are under their control, secure those assets, and maintain and return them in good working order. Employees are financially responsible for any damage to any Firm property under their control over and above normal wear and tear.

Violence in the Workplace

The Firm believes that all employees should be treated with dignity and respect. As such, acts of violence and/or threats of acts of violence will not be tolerated under any circumstances. All incidents of violence or suggested/threats of violence are to be reported immediately to your supervisor and the **President**.

All reports will be properly investigated. Violation of this policy may result in disciplinary action up to and including termination.

Weapons in the Workplace

In an effort to maintain the safety and security of our employees, as well as clients and visitors, the Firm employees are prohibited from carrying weapons or other inherently dangerous instruments on Firm property or while engaged in Firm business off the premises.

Violation of this policy may result in disciplinary action, up to and including termination of employment.

Solicitations

The Firm prohibits employees from being solicited and from soliciting financial contributions, selling merchandise, or any other form of solicitation during an employee's work time. Work

time is defined as all time when an employee is supposed to be working. It does not include an employee's own time, such as meal periods, scheduled breaks, or time before or after the employee's shift.

Solicitation for, or distribution of products or material "for profit" that is unrelated to the Firm's business is strictly prohibited anywhere on the Firm premises at all times. Further, non-employees are prohibited from distributing material or soliciting employees on the Firm's premises at any time. Violation of this policy may result in disciplinary action, up to and including termination of employment.

Dress and Personal Appearance

The Firm and its employees must maintain a consistent professional business image at all times. You are expected to wear professional attire that is appropriate to your position in accordance with the Firm's policies in effect from time to time. Violation of this policy may be grounds for disciplinary action, up to and including termination of employment. If you have any questions on what is or is not professional attire, please see the **Director of Operations**.

Disciplinary Action Policy

All employees are expected to follow the policies and procedures as outlined by the Firm. In the event that an employee fails to follow policies and procedures, the Firm will take the appropriate disciplinary action up to and including immediate termination of employment.

Health and Safety

Smoking in the Workplace

It is the Firm's policy to prohibit smoking on all company premises in order to provide and maintain a safe and healthy work environment for all employees. The law defines smoking as the "act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette or pipe of any kind."

The smoke-free workplace policy applies to:

- All areas of company buildings.
- All company-sponsored off-site conferences and meetings.
- All vehicles owned or leased by the company.
- All visitors (customers and vendors) to the company premises.
- All contractors and consultants and/or their employees working on the company premises.
- All employees, temporary employees and student interns.

Smoking is permitted in parking lots only.

Employees who violate the smoking policy will be subject to disciplinary action up to and including immediate discharge.

Workers' Compensation

From your first day of work at the Firm, you are automatically covered by Workers' Compensation Insurance. You should notify your supervisor immediately of any work-related injury or illness. If you are absent from work because of a work-related illness or injury, you may be eligible for Workers' Compensation benefits. Also, remember to report any potentially unsafe condition to facilitate correction of the problem and prevent injuries.

Any workers' compensation leave taken, when appropriate, will be applied against any eligible leave you may have under state or federal medical leave laws or pursuant to Firm policy.

Workplace Safety

The Firm attempts to protect your health and safety at work by adhering to the guidelines of the Williams-Steiger Occupational Safety and Health Act of 1970 (OSHA) and state safety laws as applicable. But your help is equally vital. Safety takes concern and effort on everyone's part. If you become aware of any potentially dangerous situation, please notify your supervisor immediately.

E-mail, the Internet and other Electronic and Telephonic Communications

The Firm's telephone, cell phone, blackberry, smartphone, computer, video, Internet and e-mail systems are corporate assets, which must be used primarily for legitimate business purposes for the Firm. All electronic and telephonic communications and information transmitted by, received from, or stored in these systems are the property of the Firm. Any personal use of these systems must not interfere with an employee's duties or compromise the security or the business of the Firm. Further, personal use of these systems may only be incidental and occasional in nature, and is generally discouraged.

Under no circumstances may users download any program or files from the internet onto their workstation or laptop for personal use.

The Firm may retain access and review any information sent via or posted on the Firm's electronic and telephonic communications systems in hard copy or electronic form and may re-transmit such information or otherwise make it available to others without your notification or consent. Users must apply the same standards with respect to the content, quality and tone of information sent or made available electronically that they apply to materials sent or made available by any other means of communication. Additionally, while the Firm cannot insure against the receipt of inappropriate incoming messages through its electronic and telephonic communications systems, users are expected to delete any such messages and are prohibited from re-transmitting any inappropriate materials received.

Users of the Firm's internal electronic and telephonic communications systems must use these systems in a manner that is consistent with all applicable Firm policies (including those contained in this Manual) and directives.

Further, without the explicit approval of the Managing Partners, no wide distribution e-mails may be transmitted through the Firm's e-mail system. Any such transmission must comply with applicable law and the Firm's policies.

To ensure that the use of electronic and telephonic communications systems is consistent with the Firm's legitimate business interests, representatives of the Firm may monitor the use of such equipment from time to time (with or without informing the employee). While the Firm does not routinely monitor all of its electronic and telephonic communications systems, it has the technical capability of doing so and reserves the right to do so. This may include, among other things, monitoring the use of the Firm's computers including internet usage of any kind, employee files, including those maintained on computer diskettes, network drives or other hardcopy form, and voice-mail and email messages.

Users must delete all unnecessary e-mail and voicemail messages stored in these systems. Such efforts not only maintain the performance and efficiency of the e-mail and voicemail systems, but reduce the chances that a message, even one which represented an appropriate use of either of these systems at the time that it was sent, is subsequently taken out of context and becomes subject to misinterpretation.

Additionally, to the extent authorized by applicable federal, state or local laws, the Firm may record and monitor certain telephone conversations. The purpose of such recording is generally to provide verification of transactions entered into by the Firm on its own behalf and on behalf of its customers, to protect the Firm against employee misconduct, and to ensure that the telephone lines are being used consistent with applicable Firm policies. Your consent to such recording and monitoring is presumed by your use of the Firm's phone lines.

Inappropriate Uses

While it is impossible to list all of the inappropriate uses of the Firm's electronic and telephonic communications systems, the following are some examples:

- Sending, storing or posting any message which treats employees or others in a manner that is abusive, insulting, obscene or otherwise inappropriate or unprofessional, such as:
 - any message that may be construed as harassment or disparagement of others based on race, color, religious creed, ancestry, age, sex, national origin, disability, genetic information, military status, and any additional categories protected by applicable federal, state or local laws;
 - any message that may be defamatory toward any person;
 - any message which in any other way violates the Firm's standards of ethics and professional conduct;
 - any message that may be disruptive or harmful to morale;
 - any message that threatens physical harm; or
 - any message soliciting or proselytizing on behalf of political or religious causes or other non-Firm persons or organizations.
- Transmitting, storing or posting confidential or proprietary information in any manner which is inconsistent with applicable the Firm policies and directives.
- Utilizing an e-mail previously sent by the Senior Management or Executive Board to transmit or re-transmit to a wide distribution.
- Posting any messages, photos, or information of any kind involving any aspect of the Firm to social media websites or mediums including, but not limited to, Facebook, My Space, LinkedIn, Twitter, Pinterest, or YouTube, or to any blogs, chat groups, or other mediums to which the public has access without the prior written consent of the President or Director of Operations.

Users who violate any provisions of this policy may be subject to disciplinary action, up to and including termination.

Your Records

Personnel Records

The Firm maintains a system that safeguards the confidentiality of employee records. In addition, the Firm's employees must, at all times, protect information they receive regarding the activities and plans of the Firm and our clients.

Internal Access to Personnel Files

Although files on all employees are retained to meet legal and registration requirements, these files will not be shared with other employees, except authorized employees, who require use of these files to perform their duties. Supervisors who wish to see your file must receive permission from the Director of Operations.

Third Party Request for Personnel Information

All requests for credit or other information made by persons outside the Firm for both current and former employees must be referred to the Director of Operations.

- Requests for credit identification must be presented to the Director of Operations in writing.
- If verification of employment is requested, only your last job title and dates of employment will be provided.
- Information concerning your salary will be disclosed only if you sign a release authorizing the Firm to provide that data.

Accordingly, supervisors may not respond to information requests or provide letters of reference.

- Subpoenas, court orders, or other legal process directing the production of employment records should be immediately referred to the President and Director of Operations.

The Firm complies with all applicable federal, state or local laws regarding personnel records.

Personal Record Changes

The Director of Operations maintains a variety of data regarding employees. You are responsible for making sure that the personal information in your record is correct and up-to-date. Failure to do so can affect certain benefit eligibility and elections, and may prevent you from receiving important correspondence from the Firm.

All status changes, including changes of name, home address, telephone number, and emergency contacts should be reported promptly to the Director of Operations.

Additionally, if you wish to change your designated beneficiaries or your dependent information, contact Director of Operations.

Job Termination and related issues

Notification

Unless otherwise required, if you plan to resign, you should notify your supervisor at least two weeks prior to your departure. The Firm may permit an employee to continue employment during the two-week notice period or accept their resignation immediately. In the event the Firm chooses to accept the resignation immediately, the employee will be paid for the remaining portion of the two-week notice period. Any absences during this remaining two-week period may not be paid and may be grounds for earlier termination. Any PTO that was taken before it was accrued may be deducted from the employee's final pay to the extent permitted by law.

An individual's employment with the Firm may be terminated for any or no reason. If the Firm provides a reason for termination, it may include any of following reasons:

- Reduction in the Firm's workforce;
- Elimination of the employee's position;
- Retirement;
- Poor Performance;
- Job Abandonment
- Act of misconduct or violation of Firm policies; or
- Such other action or reason deemed appropriate by Senior Management.

Exit Interview

Any employee leaving the Firm, regardless of separation reason or method, will generally be given the option of an exit interview. During this exit interview the employee will be given the opportunity to ask questions and/or make comments regarding their job. Additionally, other issues, including the following, may be discussed:

- Reason for termination;
- Status of insurance and other benefits;
- Final pay;
- Return of keys and other Firm property;
- Correct forwarding address.

Employees will receive their final pay on the next regularly scheduled payday following their last day of work or in accordance with relevant state and local laws.

References

It is the policy of the Firm not to provide letters of recommendation. Since information regarding employees is considered confidential, the Director of Operations will release only your last job title and dates of employment, upon receiving a written request from you (See "Your Record: Personnel Records").